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15 March 1993

Ms. Ann V. Hiller
Delaware Department of Natural Resources and
Environmental Control
715 Grantham Lane
New Castle, DE 19720-4801

Re: Standard Chlorine Superfund Site

Dear Ms. Hiller:

This letter follows up the meeting Steve Reese and I had with Karl Kalbacher on 6 February 1992, my letters to Mr. Kalbacher dated 10 February and 2 April 1992, and your letter to me of 24 April 1992. Copies of this correspondence are enclosed.

As I believe you are aware, when we met with Mr. Kalbacher on 6 February 1992 we requested that DNREC consider additional sampling of MW-10 on our property as well as the installation of additional wells between MW-10 and the property line separating Air Products and Standard Chlorine. This request was based upon the results of the August 1990 sampling of MW-10 and the historical sampling results for monitoring wells TW-1 through 4 on Standard Chlorine's property. Wells TW-1 through 4 are located quite close to the property boundary between Air Products and Standard Chlorine, and the groundwater results show significant levels of chlorinated benzene species in those wells. Moreover, the soils in the vicinity of TW-1 through 4 were considerably contaminated at depth. During our meeting Mr. Kalbacher concurred with the need for additional sampling, stating that DNREC had already come to the same conclusion.

My 2 April 1992 letter to Mr. Kalbacher requested that Air Products be invited to what we understood to be a pending meeting among DNREC, EPA and Standard Chlorine to discuss, among other things, the installation of additional groundwater monitoring wells on Air Products' property. In your 24 April 1992 response, you stated that this topic would be the subject of a separate meeting and that Air Products would be invited to attend.

Since we have heard little on this issue over the past eleven months, Air Products would again like to reiterate its request that it be kept informed regarding developments pertaining to the Standard Chlorine site in general and Air Products' property in particular. We assume that the views expressed by Mr. Kalbacher at our 6 February 1992 meeting (confirmed by my 10 February 1992 letter) have not changed, and that DNREC fully intends for Standard

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Chlorine to do additional investigatory and, if required, remedial work on Air Products' property. Air Products believes that contamination exists on our property attributable to Standard Chlorine, that the extent of this contaminant plume has not been defined, and that an effective remediation of our property requires additional investigatory work to determine the contours of the plume.

Air Products would welcome the opportunity to meet with you or other representatives of DNREC and/or EPA to discuss these issues. We would also request that you add Steven Reese of Air Products to your distribution list for all mailings and notices regarding the Standard Chlorine superfund site. If you have any questions regarding this letter, please do not hesitate to contact me at (215) 481-2558. Again, we appreciate your taking the time to address these matters and we look forward to further discussions between DNREC and Air Products.

Sincerely,

Todd Solodar

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cc: Ms. Kate Lose, EPA Region III